

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

TIMOTHY J. HARDY,

Plaintiff,

V.

**CHESAPEAKE HOSPITAL AUTHORITY
t/a CHESAPEAKE REGIONAL
MEDICAL CENTER,**

Defendant.

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C.A. No. 2:24-cv-00029 EWH/RJK

**DEFENDANT CHESAPEAKE HOSPITAL AUTHORITY'S
MOTION TO DISMISS THE COMPLAINT**

Defendant, Chesapeake Hospital Authority (“CHA”), by counsel, pursuant to Rule 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, moves to dismiss the Complaint and all claims for relief therein against CHA, for failure to state a claim upon which relief can be granted and for lack of subject matter jurisdiction, for all the reasons set forth in the accompanying Memorandum in Support.

WHEREFORE, Chesapeake Hospital Authority respectfully requests that the Court enter an order dismissing the Complaint, and all claims for relief asserted against Defendant, with prejudice, and granting such other relief as the Court deems just and appropriate.

**CHESAPEAKE HOSPITAL
AUTHORITY**

By: /s/ Ahmed E. Mohamed Khalil
Counsel

CERTIFICATE OF SERVICE

I certify that on this 17th day of May, 2024, I electronically filed the foregoing using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Ahmed E. Mohamed Khalil

John M. Bredehoft (VSB No. 33602)

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